



KANSAS

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DEPARTMENT OF AGRICULTURE
ADRIAN J. POLANSKY, SECRETARY

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Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: Animal Identification Strategic Plan

To Whom It May Concern:

The United States Department of Agriculture's Animal and Plant Health Inspection Service has asked for public comment regarding the national animal identification system and a draft strategic plan issued April 25, 2005.

Specifically, USDA-APHIS has asked for comment on the following questions:

- Should the entire system be made mandatory by January 2009?

Yes, the system should be made mandatory. However, the current timeframe to make the system mandatory by January 2009 may be too generous. Preventing the spread of highly virulent diseases like foot-and-mouth will require swift action. As long as the program is voluntary, untagged animals will move undetected and it will be impossible to know if we have taken every appropriate protective action. USDA-APHIS should make animal identification mandatory sooner rather than later.

- Should producers be responsible for tagging their animals before they move to a premises where they are commingled with other animals? Who should ensure compliance?

Yes, producers should be responsible for tagging their animals. Staff at sale barns, feedlots and fairs should check for identification. The producer should be the only one to know the animal's origin.

- Some producers may not be able to tag their animals. Should there be sites where producers can take their animals for tagging?

It is not realistic to expect producers to load, transport and unload animals for tagging. However, sale barns, feedlots and similar locations probably are well-suited to provide this service. Veterinarians are also a good choice, and they may be able to visit the farm to tag the animals rather than requiring the producer to deliver the livestock to a tagging site.

- How will compliance be achieved when an animal is sold directly from the seller to the buyer?

The producer should be responsible for identifying the animal. The seller should ensure that animals are already tagged when they are purchased. Untagged animals should not be purchased.

- Animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this adequate to achieve traceability?

This should be adequate for disease traceback. However, tagging the animal at birth, and recording the animal's birth date, could make the identification system more useful to the producer. Providing source verification and documenting an animal's age could improve the marketability of the beef derived from that animal. While the intent of the animal identification system is to contain disease, it also could be used to enhance the potential return to producers by providing a more marketable product.

- Are the timelines for implementing the animal identification system realistic?

USDA should shorten the timeframe for making the system mandatory. Establishing a national animal identification system is a monumental task, but prolonging the time that it is voluntary merely puts American livestock at risk.

- Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed?

To the extent possible, they should be implemented on a similar timeline. However, since the intent of the system is to contain disease, animals that are more prone to being moved during their life cycle should be the highest priority.

- What are the most cost-effective ways for submitting information to the database?

Electronic submission via the Internet, file transfer from a herd-management computer system, and third party submission of computerized data are going to be the most practical.

- What specific information should be protected from disclosure?

If we want producers to embrace animal identification, we need to ensure that their information is protected. Also, the intent of the system is to respond to and contain foreign animal diseases. Therefore, all data should be protected as well as any other proprietary information the government keeps to protect the food production system and its related infrastructure.

- The NAIS would require states, producers and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements?

First, the recordkeeping system must be electronic. Second, while it may seem redundant, sales should be reported by both the seller and the buyer. Redundant reporting will reduce the opportunity for incorrect information to be recorded.

- An industry-led initiative suggests a privately managed database as an alternative for managing data on animal tracking in the NAIS.

A critical system like the NAIS would best be managed by the government entity that will use it to respond to foreign animal disease. However, an industry-led initiative could be very useful to producers who want to record more data than is required by the animal identification system.

USDA-APHIS has made great strides getting the National Animal Identification System off the ground, but I believe we should be moving more quickly toward a comprehensive, mandatory program. In states like Kansas, where we rank second nationwide in cattle and calves on farms and cattle and calves on feed, I worry that the fledgling system will be of little use to us if we were to experience an outbreak of a virulent disease like foot-and-mouth.

I appreciate the opportunity to offer my views on the National Animal Identification System.

Sincerely,
Adrian J. Polansky
Kansas Secretary of Agriculture

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